## REMARKS

Claims 1-24 remain pending in the above-identified patent application.  No new matter has been added.

## CLAIM REJECTIONS - 35 U.S.C. § 102(a/e)

Claims 1-4, 20, 21, 23 and 24 are rejected under 35 U.S.C. § 102(a/e) as being anticipated by Lineman et al. (2003/0065942). Applicants have reviewed the above cited reference and respectfully submit that the embodiments of the present invention as recited in Claims 1-4, 20, 21, 23 and 24 are not anticipated by Lineman for at least the following rationale.

Independent Claim 1, and similarly independent Claims 20 and 23 as amended, recites the features:

> A method of establishing a consistent password policy, said method comprising:
> describing a plurality of password policies in a computer usable password policy data structure;
> accessing said computer usable password policy data structure by a password policy enforcement agent; and
> enforcing at least one of said plurality of password policies described within said password policy data structure by said password policy enforcement agent.

"[A]nticipation requires the presence in a single prior art reference disclosure of *each and every element* of the claimed invention, arranged as in the claim ...." *Lindemann Maschinefabrik GmbH v. American Hoist & Derrick Co.*, 221 USPQ 481, 485 (Fed. Cir. 1984) (emphasis added).

MPEP §2131 provides:

> "A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." Verdegaal Bros. v. Union Oil Co. of California, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). ... "The identical invention

must be shown in as complete detail as is contained in the ... claim." Richardson v. Suzuki Motor Co., 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). The elements must be arranged as required by the claim.

Applicants respectfully submit that Lineman fails to disclose each and every element of Claim 1, arranged as in the claim.

In fact, Applicants respectfully submit that Lineman actually <u>teaches away</u> from a claimed feature of Independent Claims 1, 20 and 23. Specifically, Independent Claims 1, 20 and 23 include the feature of "<u>enforcing at least one of said plurality of password policies</u> described within said password policy data structure <u>by said password policy enforcement agent</u>," (emphasis added). With the present claimed invention, the policy enforcement agent performs the enforcing.

In contrast to the present claimed feature, Lineman teaches in paragraph [0095] "this security policy is enforced by configuring settings on the various computer systems 26 in the network 10." With Lineman, the enforcement is performed locally on the various computer systems and is done so by configuring settings. This is very different and teaches away from a policy enforcement agent performing the enforcement, as claimed.

For at least the foregoing rationale, Applicants respectfully submit that Claim 1, and similarly Claims 20 and 23, are not anticipated by Lineman under 35 U.S.C. §102(a/e). As such, Applicants submit Claims 1-4, 20, 21, 23 and 24

are not anticipated by lineman and respectfully request the rejection be removed.

Claim 19 is rejected under 35 U.S.C. 103(a) as being unpatentable over Lineman in view of Cole (2002/0161707). Applicants have reviewed the above cited references and respectfully submit that the embodiments of the present invention as recited in Claim 19 is patentable over Lineman in view of Cole for at least the following rationale.

As stated above, Applicants respectfully submit that Lineman fails to teach or suggest the claimed feature of "enforcing at least one of said plurality of password policies described within said password policy data structure by said password policy enforcement agent." Applicants have reviewed Cole and respectfully submit that Cole fails to remedy the deficiencies of Lineman. Cole may teach exchanging XML messages, however, Cole fails to teach or suggest "enforcing at least one of said plurality of password policies described within said password policy data structure by said password policy enforcement agent," as claimed.

For this rational, Applicants respectfully submit that Claim 19 is patentable over Lineman in view of Cole and respectfully request the rejection be removed.

Claims 5-18 and 22 are rejected under 35 U.S.C. 103(a) as being unpatentable over Lineman in view of Password Policy of eRA (PP hereafter).

Applicants have reviewed the above cited references and respectfully submit that the embodiments of the present invention as recited in Claims 5-18 and 22 are patentable over Lineman in view of PP for at least the following rationale.

As stated above, Applicants respectfully submit that Lineman fails to teach or suggest the claimed feature of "enforcing at least one of said plurality of password policies described within said password policy data structure by said password policy enforcement agent." Applicants have reviewed PP and respectfully submit that PP fails to remedy the deficiencies of Lineman.

In fact, as with Lineman, PP teaches away from the claimed feature of "enforcing at least one of said plurality of password policies described within said password policy data structure by said password policy enforcement agent." In section 6.0 of PP, it states "the information system security officer (ISSO) is responsible for ensuring that this policy is followed. This is very different and teaches away from a policy enforcement agent performing the enforcement, as claimed.

As such, and for this rational, Applicants submit that the claimed features of Claims 5-18 and 22 are patentable over Lineman alone and in combination with PP and Applicants respectfully the rejection be removed.

## CONCLUSION

In light of the above listed remarks, reconsideration of the rejected claims is requested. Based on the amendments and arguments presented above, it is respectfully submitted that Claims 1-24 overcome the rejections of record. Therefore, allowance of Claims 1-24 is respectfully solicited.

Should the Examiner have a question regarding the instant amendment and response, the Applicants invite the Examiner to contact the Applicants' undersigned representative at the below listed telephone number.

Respectfully submitted,
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